

**Technical Review and Evaluation
Of
Application for Air Quality Permit #31876**

I. INTRODUCTION

The Yucca Power Plant, located at 7522 South Somerton Avenue in Yuma, Arizona, is jointly owned by Arizona Public Service Company (APS) and Imperial Irrigation District (IID). APS is the sole operator of the facility. The station provides power to the electric grid on an as-needed basis, primarily during summer months when air conditioning power demands are high.

A. Company Information

Facility Name:	Yucca Power Plant
Mailing Address:	7522 S. Somerton Avenue, Yuma, AZ 85364
Facility Address:	7522 S. Somerton Avenue, Yuma, AZ 85364

B. Attainment Classification

The source is in a non-attainment area for PM₁₀.

II. FACILITY DESCRIPTION

A. Description

Please refer to the Permit application.

B. Control Equipment

The Yucca Power Plant has no air pollution control equipment.

C. Parameters of Interest

The maximum process rates and operating hours of the significant points of emissions at Yucca are summarized in Table 1. Operational flexibility provides the ability to operate the single Steam Unit, and the five Combustion Turbines in any combination as required. The plant also has the flexibility to operate the Auxiliary Boiler to provide heat for fuel oil and maintenance activities.

Table 1: Maximum Process Rates

Unit	Hours/yr	MW	MW-hr/yr
Steam Unit #1	8760	80	700800
Turbine #1	8760	22	192720
Turbine #2	8760	22	192720
Turbine #3	8760	67	586920

Unit	Hours/yr	MW	MW-hr/yr
Turbine #4	8760	66	578160
Turbine #21	8760	23.2	203232
Total			2454552

The Yucca Power Plant currently has the capability to burn natural gas and/or fuel oil. The Steam Unit, all five combustion turbines, and the Auxiliary Boiler can be operated at a capacity factor of 0 to 100%. Table 2 summarizes the normal and the alternate operating scenarios at the Yucca plant.

Table 2: Operating Scenarios

Source	Normal Operating Scenarios	Alternate Operating Scenarios
Steam Unit	Natural Gas	
		#4 through #6 grades Fuel Oil
		Co-firing #4 through #6 grades Fuel Oil and Natural Gas
Combustion Turbines #1,2, and 3	Natural Gas	
		#2 Fuel Oil
		Co-firing #2 Fuel Oil and Natural Gas
Combustion Turbines #4 and 21	#2 Fuel Oil	None
Auxiliary Boiler	Natural Gas	
		#4 through #6 grades Fuel Oil
		Co-firing #4 through #6 grades Fuel Oil and Natural Gas

III. EMISSIONS

The potential air emissions for the Yucca Power Plant were estimated primarily from emission factors. These emission factors were taken from U.S. EPA's AP-42 publication "Compilation of Air Pollutant Emission Factors", U.S. EPA's Factor Information Retrieval Database (FIRE), the California Air Resources Board (CARB) Emissions Dataset retrieved through U.S. EPA's AirChief CDROM, and Ventura County California's AB2588 dataset. Even though natural gas alone or co-firing with natural gas and fuel oil are the normal operating scenario's for many of the units, the emissions summarized in Table 3 are the uncontrolled maximum potential emissions using fuel oil only.

Table 3: Emissions Summary

Pollutant	PM ₁₀ (tpy)	SO ₂ (tpy)	NO _x (tpy)	CO (tpy)	VOC (tpy)	HAPs
Potential to Emit	485.7	4352.9	10078.8	174.7	34.3	7.9

IV. COMPLIANCE HISTORY

Compliance inspections and performance tests are being conducted regularly on this source to ensure compliance with the permit conditions. Table 4 below summarizes some of the recent inspections that have been conducted on the source and the results of the inspections.

Table 4: Inspection Results

Inspection Date	Type of Inspection	Results
June 15, 2004	Level 1 Inspection ID No. 51206	The Steam Unit was tested for NO _x emissions. The tested emission rate was 31.6 lbs/hr. The inspection indicated that the source was in compliance.
June 17, 2003	Level 1	The Steam Unit was tested for NO _x emissions. The tested emission rate was 32.0 lbs/hr. The inspection indicated that the source was in compliance.
June 2, 2002	Level 1	The Steam Unit was tested for NO _x emissions. The tested emission rate was 29.9 lbs/hr. The inspection indicated that the source was in compliance.
June 12, 2001	Level 2 FAR No. 25955	An annual compliance inspection of the steam generator and the five combustion turbines was conducted. The inspection indicated that the source was in compliance.
June 1, 2001	Level 1	The Steam Unit, CT#1, and CT#2 were tested for NO _x emissions. The tested emission rates were 33.6, 130.1, and 101.47 lbs/hr respectively. The inspection indicated that the source was in compliance.
December 15, 2000	Level 1	CT#4 was tested for NO _x and CO emissions. The tested emission rates were 351 and 4.66 lbs/hr respectively. The inspection indicated that the source was in compliance.
June 6, 2000	Level 1	The Steam Unit was tested for NO _x emissions. The tested emission rate was 38.4 lbs/hr. A RATA was also performed on the CEMS and the relative accuracy was determined to be 3.6%. The inspection indicated that the source was in compliance.
May 31, 2000	Level 1	CT#3 was tested for NO _x and CO emissions. The tested emission rates were 163.8 and 3.26 lbs/hr respectively. The inspection indicated that the source was in compliance.
May 18, 1999	Level 1	The Steam Unit was tested for NO _x emissions. The tested emission rate was 56.3 lbs/hr. A RATA was also performed on the CEMS and the relative accuracy was

Inspection Date	Type of Inspection	Results
		determined to be 3.2%. The inspection indicated that the source was in compliance.
April 27, 1998	Level 1	The Steam Unit was tested for NO _x emissions. The tested emission rate was 131.6 lbs/hr. A RATA was also performed on the CEMS and the relative accuracy was determined to be 1.6%. The inspection indicated that the source was in compliance.

V. APPLICABLE REQUIREMENTS

The Permittee has identified the applicable regulations that apply to each unit in its permit application. Table 5 below summarizes the findings of the Department with respect to the regulations that apply to each unit.

Table 5: Applicable Regulations Verification

Unit ID	Start-up date	Control Equipment	Applicable Regulations	Verification
Steam Unit 1	3/4/59	None	A.A.C. R18-2-702.B A.A.C. R18-2-703.A A.A.C. R18-2-703.B A.A.C. R18-2-703.C.1 A.A.C. R18-2-703.E.1 A.A.C. R18-2-703.H A.A.C. R18-2-703.J A.A.C. R18-2-703.K 40 CFR 73 40 CFR 75	The start-up date of this unit predates the enactment of the Act. Since the heat input is 838 MMBtu/hr (>250 MMBtu/hr), this unit is subject to R18-2-703. NO _x standards are not applicable to this source because the start-up date is prior to May 30, 1972. For the same reason, the SO _x standard of 1.0 lb/MMBtu applies.
Gas Turbine 1	7/1/71	None	A.A.C. R18-2-719.A A.A.C. R18-2-719.B A.A.C. R18-2-719.C.1 A.A.C. R18-2-719.E A.A.C. R18-2-719.F A.A.C. R18-2-719.H A.A.C. R18-2-719.I A.A.C. R18-2-719.J A.A.C. R18-2-719.K	The start-up date of this unit is prior to October 3, 1977, and hence is not subject to 40 CFR 60, Subpart GG. This unit is subject to the opacity standard of 40% and the sulfur dioxide standard of 1.0 lb/MMBtu.
Gas Turbine 2	7/1/71	None	Same as above	Same as above
Gas Turbine 3	6/20/73	None	Same as above	Same as above
Gas Turbine 4	7/9/74	None	Same as above	Same as above
Gas Turbine 21	12/28/78	None	Same as above	Although the start-up date is later than the trigger date of Subpart GG, the equipment was installed prior to 1977. Hence, this unit is subject to R18-2-719. This unit is subject to an opacity standard of 40% and a sulfur

Unit ID	Start-up date	Control Equipment	Applicable Regulations	Verification
				dioxide standard of 1.0 lb/MMBtu.
Auxiliary Boiler	1974	None	A.A.C. R18-2-724.A A.A.C. R18-2-724.B A.A.C. R18-2-724.C.1 A.A.C. R18-2-724.E A.A.C. R18-2-724.G A.A.C. R18-2-724.J A.A.C. R18-2-724.K	The heat input of this unit is 71 MMBtu/hr (< 250 MMBtu/hr) and the date of construction is prior to the trigger date (6/9/89) for 40 CFR 60, Subpart Dc. Hence, this unit is subject to R18-2-724. The unit is subject to an opacity standard of 15% and a Sulfur dioxide standard of 1.0 lb/MMBtu.

VI. PREVIOUS PERMITS

A. List of the permits

All of the permits issued to APS-Yucca Power Plant are listed in the table below.

Table 6: Previous Permits

PERMIT NUMBER	LTF NUMBER	DATE PERMIT ISSUED	APPLICATION BASIS	DESCRIPTION
1001447	21527	11/21/2000	Permit Transfer	Facility's ownership was transferred from Arizona Public Service Company to Pinnacle West Energy Corporation.
1000107	24665	6/17/1999	Class I Permit	Title V permit for facility

B. Previous Permit Conditions

1. Permit #1000107

OPERATING PERMIT #1000107	DELETE	KEEP	REVISE	STREAMLINE	REMARKS
Attachment "A"			√		Attachment "A" has been updated.
Attachment "B". I					
I. A. 1			√		Opacity standard for the Steam Unit is revised to 20% in the renewal permit.
I. A. 2		√			Particulate matter standards are unchanged.
I. A. 3		√			Sulfur dioxide emissions remain at one pound per MMBtu of heat input in the renewal permit.
I. A. 4		√			High sulfur fuel oil cannot be used in the Steam Unit without the Director's authorization. Co-firing of natural gas

OPERATING PERMIT #1000107	DELETE	KEEP	REVISE	STREAMLINE	REMARKS
					and fuel oil nos. 4 through 6.
I. A. 5		√			Definition of heat input is kept in the renewal permit.
I. B. 1		√			Opacity standard for the combustion turbines and the diesel starting engines is unchanged.
I. B. 2		√			Particulate matter standards are unchanged.
I. B. 3		√			Sulfur dioxide emissions remain at one pound per MMBtu of heat input in the renewal permit.
I. B. 4		√			High sulfur fuel oil cannot be used in the combustion turbines without the Director's authorization. Co-firing of natural gas and fuel oil no. 2 is permitted in turbines 1, 2, and 3. Only no. 2 fuel oil can be fired in turbines 4 and 21, and also the diesel startup engines.
I. B. 5		√			Definition of heat input is kept in the renewal permit.
I. C. 1		√			Opacity standard for the auxiliary boiler is unchanged.
I. C. 2		√			Particulate matter standards are unchanged.
I. C. 3		√			Sulfur dioxide emissions remain at one pound per MMBtu of heat input in the renewal permit.
I. C. 4		√			High sulfur fuel oil cannot be used in the auxiliary boiler without the Director's authorization. Co-firing of natural gas and fuel oil nos. 4 through 6.
I. C. 5		√			Definition of heat input is kept in the renewal permit.
I. D. 1			√		Opacity standard for the cooling tower is revised to 20% in the renewal permit.
I. D. 2		√			Particulate matter standards are unchanged.
I. E.		√			Non Point source requirement remain in the renewal permit.
I. F. 1 Abrasive Blasting		√			"Abrasive Blasting" requirements remain to be the same in the renewal permit.
I. F. 2 Use of Paints		√			Requirements for "Use of Paints" remain to be same in the renewal permit.
I. F. 4		√			Requirements for "Mobile Sources"

OPERATING PERMIT #1000107	DELETE	KEEP	REVISE	STREAMLINE	REMARKS
Mobile Sources					include emission limitation and standards for roadway and site cleaning machinery and off-road machinery.
I. F. 5 Demolition/Renovation		√			Requirements for “Demolition /Renovation” remain the same in the renewal permit application.
Attachment “B”. II. Monitoring, Recordkeeping And Reporting Requirements					
II. A			√		A certified Method 9 observer shall be on site or on call.
II. B			√		Source is required to submit reports of all of the required monitoring activities to be submitted with the compliance certification.
II. C			√		Permittee shall maintain a 12-month rolling total of operating hours
II. D, E, F			√	√	The monitoring, recordkeeping and reporting requirements have been revised and streamlined.
Attachment “B”. III. Testing Requirements					
III. A				√	Opacity readings must be observed in accordance with EPA Reference Method 9.
III. B				√	Performance testing will be conducted within 90 days after the rolling twelve month rolling total exceeds 100 tpy.
Attachment “C”	√				Permit shields are added to include the applicable requirements.
Attachment “D”		√			Equipment list remains the same in the renewal permit.
Attachment “E”	√				Insignificant activities have been relocated to the Technical Support Document.
Attachment “F”		√			Phase II acid rain provisions have been kept as part of this renewal permit.

VII. MONITORING REQUIREMENTS

Particulate matter emission and opacity from simple cycle gas turbines and associated starting diesel engines, the steam unit, and the auxiliary boiler are monitored by setting up a baseline opacity standard and conducting visual surveys by a certified Method 9 observer. The Permittee is to set a baseline opacity within 90 days of the permit issuance by conducting Method 9 performance tests while operating at normal representative working conditions, to establish a stack baseline opacity level for each fuel type the Permittee anticipates using on a routine basis. Prior to the use of any other permitted fuel, the Permittee shall notify the Department and establish baseline opacity levels. Because the auxiliary boiler has not been used for the past three years, the baseline opacity will be established for the auxiliary boiler within 90 days of first use

within this permit term. The average of a minimum of three consecutive readings will be used to determine the baseline opacity for the stack. Since this plant is a peaking plant and is operated on as-needed basis, the opacity of the emissions from the stacks will be monitored for every 80 hours of operation on fuel oil, and every 720 hours of operation on natural gas. If at any time, the opacity reading exceeds the baseline opacity, then the source is required to investigate the causes of this variation. These investigations will be conducted, recorded, and reported in accordance with the conditions set in Attachment B of the operating permit. Exceedances of the baseline opacity will not be considered non-compliance with permit limitation; however it will be used to determine a possible need for corrective action to be taken.

The facility is also required to maintain a copy of the fuel oil purchase specification sheet indicating the heating value and sulfur content of the fuel oil combusted in the engine. Purchase specification sheet should indicate the method used to determine the sulfur content of the fuel oil being combusted.

VIII. TESTING REQUIREMENTS

This operating permit does not contain emission limitations for NO_x and the allowable emissions for SO₂ are higher than the potential to emit (based on worst case sulfur content in the diesel being combusted at 0.9%). As a result, the performance testing for these pollutants will be conducted if their emission exceeds 100 tons per year, in accordance with Arizona Testing Manual. The performance testing will be conducted on an emission unit within 90 days after the rolling twelve month rolling total exceeds 100 tons per year from that unit. The number of hours after which 100 tons per year of each pollutant is emitted is shown in table 7 below:

Equipment	Annual SO ₂ Emissions tons/year	Annual NO _x Emissions tons/year	Annual PM ₁₀ Emissions tons/year	Hours to Trigger Testing Using Fuel Oil			Hours to Trigger Testing Using Natural Gas		
				SO ₂	NO _x	PM ₁₀	SO ₂	NO _x	PM ₁₀
Steam Unit	3537.3	946.1	314.1	248	926	2789	N/A	1044	N/A
Auxiliary Boiler	299	114.9	24	2930	7624	N/A	N/A	N/A	N/A
Combustion Turbine #1	62.1	1084.5	15.1	N/A	808	N/A	N/A	1813	N/A
Combustion Turbine #2	62.1	1084.5	15.1	N/A	808	N/A	N/A	1813	N/A
Combustion Turbine #3	165.1	2882.1	40.1	5306	304	N/A	N/A	682	N/A
Combustion Turbine #4	165.1	2882.1	40.1	5306	304	N/A	N/A	N/A	N/A
Combustion Turbine #21	62.1	1084.5	15.1	N/A	808	N/A	N/A	N/A	N/A

Table 7: Hours to Trigger Testing

For PM, in addition to the above mentioned testing, the Permittee will be required to do an initial performance test within the first year of the permit term to show compliance with the emission standard specified in the permit.

IX. COMPLIANCE ASSURANCE MONITORING (CAM) (40 CFR 64):

The Yucca Power Plant does not have add-on emissions controls on any unit. Therefore, CAM does not apply. CAM only applies to emission units with an add-on control device.

X. INSIGNIFICANT ACTIVITIES

Source No.	Insignificant Activities	Pollutants	Insignificant	Governing Rule
1	Accidental Fires	PM ₁₀ , Combustion Products	Yes	A.A.C.R18-2-101.57.j
2	Acetylene, Butane, Propane Torches	Acetylene, Butane, Propane	Yes	A.A.C.R18-2-101.57.j
3	Acid Tank Vents (Demineralizer and Cooling Tower)	Acid Vapor	Yes	A.A.C.R18-2-101.57.j
4	Activities Associated with Maintenance Repair or Dismantlement of an Emission Unit or other Equipment.	VOC's	Yes	A.A.C.R18-2-101.57.a
5	Administration Building Gas Heaters (2)	Combustion Products	Yes	A.A.C.R18-2-101.57.j
6	Aerosol Can Usage	VOCs	Yes	A.A.C.R18-2-101.57.j
7	Auxiliary Boiler Safety Relief Valves	Condensate	Yes	A.A.C.R18-2-101.57.j
8	Auxiliary Boiler Blowdown	Condensate	Yes	A.A.C.R18-2-101.57.j
9	Bearing Cooling Water	Water Vapor, VOC's	Yes	A.A.C.R18-2-101.57.j
10	Boiler Acid Wash	Acid Vapors	Yes	A.A.C.R18-2-101.57.j
11	Boiler Feed Pump Hydraulic Coupling	Oil Vapors	Yes	A.A.C.R18-2-101.57.j
12	Brazing and Soldering Activities	PM ₁₀ , Fumes	Yes	A.A.C.R18-2-101.57.j
13	Cathodic Protection	Ozone	Yes	A.A.C.R18-2-101.57.j
14	Caulking Operations	Solvents	Yes	A.A.C.R18-2-101.57.j
15	Caustic Tank Vent	Caustic Vapors	Yes	A.A.C.R18-2-101.57.j
16	Chemical Storage Barrels	Solvent Vapors	Yes	A.A.C.R18-2-101.57.j
17	Chemical Storage, Hazardous Products and staging Area	Solvent Vapors	Yes	A.A.C.R18-2-101.57.j
18	Cooling Tower Chemical Activities	PM ₁₀ , Additive Vapors	Yes	A.A.C.R18-2-101.57.j
19	Corona	Ozone	Yes	A.A.C.R18-2-101.57.j
20	Demineralizer Regeneration	Acid and Caustic Vapors	Yes	A.A.C.R18-2-101.57.j
21	Electric Motors	Ozone	Yes	There is no fuel combustion in electric motors.
22	Emissions sampling and Associated Activities	Combustion Products	Yes	A.A.C.R18-2-101.57.j

Source No.	Insignificant Activities	Pollutants	Insignificant	Governing Rule
23	Evaporative Coolers	Water Vapor	Yes	A.A.C.R18-2-101.57.j
24	Evaporation Pond	Water Vapor	Yes	A.A.C.R18-2-101.57.j
25	Facilities used for Preparing Food	Combustion Products	Yes	A.A.C.R18-2-101.57.j
26	Fire Fighting Activities and Training	PM ₁₀ , Combustion Products	Yes	A.A.C.R18-2-101.57.j
27	Flammable Storage Cabinets	Solvent Vapors	Yes	A.A.C.R18-2-101.57.j
28	Flares Used to Indicate Danger to the Public	PM ₁₀ , Combustion Products	Yes	A.A.C.R18-2-101.57.j
29	Fuel Oil Piping Systems Including: Flanges, Valves, Pump Seals, Pressure Relief Valves and other Individual Components	Oil Vapor	Yes	A.A.C.R18-2-101.57.j
30	Fugitive Dust Emissions From the Operation of Passenger Vehicle	PM ₁₀	No	A.A.C.R18-2-610
31	Gas Turbine False Start Drain	VOCs	Yes	A.A.C.R18-2-101.57.j
32	Turbine Gas Vent #1	Natural Gas	Yes	A.A.C.R18-2-101.57.j
33	Turbine Gas Vent #2	Natural Gas	Yes	A.A.C.R18-2-101.57.j
34	Turbine Gas Vent #3	Natural Gas	Yes	A.A.C.R18-2-101.57.j
35	Gas Turbine Lube Oil Vents	Oil Vapor	Yes	A.A.C.R18-2-101.57.j
36	Gas Yard Vents	Natural Gas	Yes	A.A.C.R18-2-101.57.j
37	General Office Activities	VOC's	Yes	A.A.C.R18-2-101.57.j
38	Hot Water Heater	Combustion Products	Yes	A.A.C.R18-2-101.57.j
39	Hydraulic System Reservoirs	Oil Vapor	Yes	A.A.C.R18-2-101.57.j
40	Individual Steam Unit Ignitors and Fuel Burner Assemblies	VOC's & Combustion Products	Yes	A.A.C.R18-2-101.57.j
41	Individual Steam Unit Soot Blowers	PM ₁₀	Yes	A.A.C.R18-2-101.57.j
42	Janitorial Activities	Chemical Fumes	Yes	A.A.C.R18-2-101.57.a
43	Laboratory Facilities	Acid and Base Fumes, Alcohol Vapors, VOC's	Yes	A.A.C.R18-2-101.57.j
44	Landscaping Equipment	Combustion Products, PM ₁₀	Yes	A.A.C.R18-2-101.57.a
45	Lube Oil Storage Area (New Products)	Oil Vapors	Yes	A.A.C.R18-2-101.57.j

Source No.	Insignificant Activities	Pollutants	Insignificant	Governing Rule
46	Maintenance Shop Heaters	Combustion Products	Yes	A.A.C.R18-2-101.57.j
47	Medical Activities	Alcohol	Yes	A.A.C.R18-2-101.57.j
48	Mercury Exhaust Hood	Mercury Vapors	Yes	A.A.C.R18-2-101.57.j
49	Natural Gas Fuel Piping System Including: Flanges, Valves, Pump Seals, Preddure Relief Valves and other Individual Components	Natural Gas	Yes	A.A.C.R18-2-101.57.j
50	Normal Usage of Misc. Consumer Products	CFC's and VOC's	Yes	A.A.C.R18-2-101.57.j
51	Oil Circuit Breakers	Ozone, Oil Vapor	Yes	A.A.C.R18-2-101.57.j
52	Oil Filter Draining	Oil Vapor	Yes	A.A.C.R18-2-101.57.j
53	Paint Storage Area	Solvents	Yes	A.A.C.R18-2-101.57.j
54	Painting	Solvents	No	A.A.C.R18-2-727
55	Pesticide/Herbicide Activity	Pesticide/Herbicide	Yes	A.A.C.R18-2-101.57.j
56	Portable Testing Equipment and Testing Activities	VOC's	Yes	A.A.C.R18-2-101.57.i
57	Portable Welder	PM ₁₀ , Combustion Engine	Yes	A.A.C.R18-2-101.57.j
58	Production of Hot Water Not Related to Industrial Process	Combustion Products	Yes	A.A.C.R18-2-101.57.j
59	Pump/Motor Oil Reservoirs	Oil Vapors	Yes	A.A.C.R18-2-101.57.j
60	PVC/ABS Pipe Weldings	Solvent	Yes	A.A.C.R18-2-101.57.j
61	Repair and Maintenance of Roads and Other Paved or Open Areas	PM ₁₀	No	A.A.C.R18-2-605.A
62	Safety Devices, Fire Extinguishers and Cardox System	PM ₁₀	Yes	A.A.C.R18-2-101.57.j
63	Sand Blasting	PM ₁₀	No	A.A.C.R18-2-726
64	Satellite Accumulation Barrels	Solvent Vapors	Yes	A.A.C.R18-2-101.57.j
65	Septic Tank	Methane	Yes	A.A.C.R18-2-101.57.j
66	Cooling Service Water and Piping	Water Vapors	Yes	A.A.C.R18-2-101.57.j
67	Small Equipment fueling Area	VOCs	Yes	A.A.C.R18-2-101.57.j
68	Smoking Area	Tobacco Smoke	Yes	A.A.C.R18-2-101.57.j
69	Solvent Cleaning Tank	Solvent Vapor	Yes	A.A.C.R18-2-

Source No.	Insignificant Activities	Pollutants	Insignificant	Governing Rule
	(Maintenance Shop)			101.57.j
70	Station Transformer	Oil Vapor	Yes	A.A.C.R18-2-101.57.j
71	Steam Cleaners	Water and VOCs	Yes	A.A.C.R18-2-101.57.j
72	Steam Unit Air Ejector	Non-Condensable Gases	Yes	A.A.C.R18-2-101.57.j
73	Steam Unit and Combustion Turbine Battery Banks	Acid Vapor	Yes	A.A.C.R18-2-101.57.j
74	Steam Unit Boiler Blowdown	Condensate	Yes	A.A.C.R18-2-101.57.j
75	Steam Unit Drum Vents	Condensate	Yes	A.A.C.R18-2-101.57.j
76	Steam Unit Gas Vent	Natural Gas	Yes	A.A.C.R18-2-101.57.j
77	Steam Unit Gland Steam Exhauster	Steam and Fuel Oil Vapor	Yes	A.A.C.R18-2-101.57.j
78	Steam Unit Hydrogen Scavenging and Vents	Hydrogen	Yes	A.A.C.R18-2-101.57.j
79	Steam Oil Tank Vents	Oil Vapor	Yes	A.A.C.R18-2-101.57.j
80	Steam Unit Safety Relief Valves	Steam/ Condensate	Yes	A.A.C.R18-2-101.57.j
81	Storage Tank #1, 100,000 bbls, Fuel Oil	Fuel Oil Vapor	Yes	A.A.C.R18-2-101.57.j
82	Storage Tank #2, 30,000 bbls, Fuel Oil	Fuel Oil Vapor	Yes	A.A.C.R18-2-101.57.j
83	Storage Tank #3, 6,000 bbls, Fuel Oil	Fuel Oil Vapor	Yes	A.A.C.R18-2-101.57.j
84	Storage Tank #4, 60,000 bbls, Fuel Oil	Fuel Oil Vapor	Yes	A.A.C.R18-2-101.57.j
85	Storage Tank #5, 100,000 bbls, Fuel Oil	Fuel Oil Vapor	Yes	A.A.C.R18-2-101.57.j
85	Storage Tank #6, 50,000 bbls, Fuel Oil	Fuel Oil Vapor	Yes	A.A.C.R18-2-101.57.j
87	Storage Tank #7, 286 bbls, Fuel Oil	Fuel Oil Vapor	Yes	A.A.C.R18-2-101.57.j
88	Storage Tank #8, 13.7 bbls, Fuel Oil	Fuel Oil Vapor	Yes	A.A.C.R18-2-101.57.j
89	Storm Water Drainage Area	Water Vapor	Yes	A.A.C.R18-2-101.57.j
90	Used Oil Storage Area	Oil Vapor	Yes	A.A.C.R18-2-101.57.j
91	Welding	PM ₁₀	Yes	A.A.C.R18-2-101.57.j